

1 Vanessa R. Waldref
2 United States Attorney
3 Eastern District of Washington
4 Richard R. Barker
5 Assistant United States Attorney
6 Post Office Box 1494
7 Spokane, WA 99210-1494
8 Telephone: (509) 353-2767

9 UNITED STATES DISTRICT COURT
10 EASTERN DISTRICT OF WASHINGTON

11 UNITED STATES OF AMERICA,
12
13 Plaintiff,

No. 2:21-CR-00142-TOR-1
2:21-CR-00142-TOR-2
2:21-CR-00142-TOR-4

14 v.

BILL OF PARTICULARS FOR
FORFEITURE OF PROPERTY

15 HUNTER BOW O'MEALY,
16 CALEB RYAN CARR,
17 MATTHEW GUDINO-PENA (a/k/a
18 "Cheesy"),

19 Defendants.

20 The United States of America, by and through Vanessa R. Waldref, United
21 States Attorney for the Eastern District of Washington, and Richard R. Barker,
22 Assistant United States Attorney, hereby files this Bill of Particulars for Forfeiture of
23 Property.

24 The Indictment filed October 5, 2021 (ECF No. 2), and the Superseding
25 Indictment filed November 2, 2021 (ECF No. 22), both contain a Notice of Criminal
26 Forfeiture Allegations providing notice that the United States is seeking forfeiture of
27 property pursuant to 21 U.S.C. § 853.
28

BILL OF PARTICULARS FOR FORFEITURE ~1

1 The United States hereby gives notice that the United States is seeking
2 forfeiture of the following assets from the Defendants as listed below:

3 Defendant HUNTER BOW O'MEALY

- 4
5 - any and all ammunition and firearm accessories seized on or about
6 September 30, 2021, currently in the custody of the Bureau of Alcohol,
7 Tobacco, Firearms and Explosives.

8 Defendant CALEB RYAN CARR

- 9
10 - any and all ammunition and firearm accessories seized on or about
11 September 30, 2021, currently in the custody of the Bureau of Alcohol,
12 Tobacco, Firearms and Explosives.
13 - Lee-Enfield rifle, bearing serial number: 12579;
14 - Benelli SuperNova 12 caliber shotgun, bearing serial number Z897898F19;
15 - Stevens Model 320 12 caliber shotgun, bearing serial number 151590D;
16 - Poly Technologies AK 47 7.62 caliber rifle, bearing serial number: CS-9069;
17 - Diamondback Arms DB-15 rifle, bearing serial number: 1701352;
18 - I.O. Inc. IO-15 rifle, bearing serial number: NH0000903;
19 - Smith and Wesson Model M&P 45, .45 caliber pistol, bearing serial number:
20 NDL4810;
21 - Eibar Star Firestar 9mm pistol, bearing serial number: 1940790;
22 - Micro Conversion Kit;
23 - Silver firearms suppressor

24 Defendant MATTHEW GUDINO-PENA (a/k/a "Cheesy") (4)

- 25 - Glock GMBH Model 29 10mm caliber pistol, bearing serial number: SCS463
26
27
28

- 1 - any and all ammunition and firearm accessories seized on or about September
2 30, 2021, currently in the custody of the Bureau of Alcohol, Tobacco,
3 Firearms and Explosives.

4 DATED: May 20, 2022

5 Vanessa R. Waldref
6 United States Attorney

7 *s/ Richard R. Barker*
8 Richard R. Barker
9 Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that on May 20, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following CM/ECF participant(s):

Mark E. Vovos
Attorney for Defendant Hunter Bow O'Mealy
mvovos@mvovos.digitalspacemail.net

Sandy D. Baggett
Attorney for Defendant Caleb Ryan Carr
sdbaggett@hotmail.com

David R. Partovi
Attorney for Defendant Matthew Gudino-Pena (a/k/a "Cheesy")
davepartovi@gmail.com

s/ Richard R. Barker

Richard R. Barker
Assistant United States Attorney